



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NB:JLG/LTG/MRM
F. #2018R00279

*610 Federal Plaza
Central Islip, New York 11722*

October 16, 2019

By Federal Express and ECF

Larry H. Krantz, Esq.
Krantz & Berman LLP
747 Third Avenue, 32nd Floor
New York, NY 10017

Alan M. Vinegrad, Esq.
Covington & Burling LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405

Re: United States v. Christopher McPartland and Thomas J. Spota
Criminal Docket No. 17-587 (JMA)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

The enclosed hard-drive is being produced pursuant to the terms of the parties' March 19, 2019 Stipulation and Order (the "Protective Order"). In particular, this production contains materials that were initially flagged and withheld as being potentially subject to the attorney-client privilege, but which have since been reviewed and ultimately deemed non-privileged by a taint team. The following materials are contained thereon:

(1) Documents stamped with control numbers SCDA 000632375 through SCDA 000632693, which constitute the government's further production of the electronically-saved files, e-mails, and calendars maintained by the Suffolk County Department of Information Technology ("SCDIT") for the time period between and including December 14, 2012 and December 31, 2017, for the following nine custodians:

Thomas Spota, Christopher McPartland, [REDACTED]
James Burke, [REDACTED]; and

(2) Documents stamped with control numbers SCDA_HD 000195935 through SCDA_HD 000197676, which constitute the government's further production of materials contained on the imaged hard-drives of the computers used by Thomas Spota, Christopher McPartland, and [REDACTED] during their tenure at the Suffolk County District Attorney's Office.

Any additional materials of this kind, that are reclassified as non-privileged, will continue to be produced on a rolling basis as that determination is made.

Finally, further to our discussion of September 11, 2019, concerning the government's identification of certain documents and materials that have potential relevance at trial, all of which have been previously produced to you in accordance with Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find a .PDF export of 291 documents culled from the imaged hard-drives referenced above (at #2), and a .PDF export of an additional 10 documents culled from the SCDIT "back-up tapes" referenced above (at #1). Additional materials deemed potentially relevant will be provided on a rolling basis, as they are identified, or (with respect to materials being reviewed for privilege) as they become available.

As before, these materials are being provided to you via a third party data hosting and processing company.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Nicole Boeckmann
Lara Treinis Gatz
Justina L. Geraci
Michael R. Maffei
Assistant U.S. Attorneys

Enclosure.

cc: Clerk of the Court (JMA) (by ECF) (*redacted*) (without enclosure)